



1 by September 20, 2005. The only deadline between the 30-day deadline and the pretrial  
2 conference is the deadline for responses to Motions in Limine, 15 days before the pretrial  
3 conference

4 2. The parties at this time do not intend to file Motions in Limine, but should such  
5 motions be necessary, the parties agree that responses will be filed in accordance with the  
6 existing deadline, shortening their response time accordingly.

7 3. The Parties, through counsel, had reached a settlement agreement in this action, at  
8 least in principle, but Defendant PGS has not executed the agreement or tendered payment, and  
9 has instead stated that it intends to file bankruptcy. Nonetheless, the parties are continuing to try  
10 to reach a settlement.

11 4. Because the parties had hoped to settle, they have not completed the papers  
12 required to be filed by the 30-day deadline.

13 5. There have been no previous time modifications in this case affecting the dates at  
14 issue. The only prior modification was a brief extension of the dispositive motion deadline.

15 6. The requested extension would have no effect on the pretrial or trial schedule.

16 WHEREFORE, the Parties respectfully request that this Stipulation be approved, and that  
17 that the deadline for filings due 30 days before the Pretrial Conference be extended by one week  
18 to September 27, 2005.

19 Dated this 20<sup>th</sup> day of September, 2005.

20 Respectfully submitted,

21 /s/ Daniel M. Press  
22 Daniel M. Press, Esq.  
23 CHUNG & PRESS, P.C.  
24 6723 Whittier Ave., Suite 302  
25 McLean, VA 22101  
(703) 734-3800  
(703) 734-0590 fax  
dpress@chung-press.com  
Counsel for Plaintiff



1 whether by stipulation or Court order; and describes the effect the requested time modification  
2 would have on the schedule for the case.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed on September 20, 2005.

5 /s/ Daniel M. Press

6 Daniel M. Press

7  
8 PURSUANT TO STIPULATION, IT IS SO ORDERED.

9 Date: 9/21/05

10  
11 

12 U.S. District Judge